

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 04-
	:	
v.	:	DATE FILED:
	:	
ALYSSA TITUS	:	VIOLATION:
	:	18 U.S.C. § 1014 (false statement on loan
	:	and credit application - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting - 1
	:	count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

1. ALY-Wear, Inc. was a clothing manufacturing company located at 400 West Main Street, Ephrata, Pennsylvania. **ALYSSA TITUS** was an owner of ALY-Wear.
2. On or about September 29, 1999, ALY-Wear entered into a Loan and Security Agreement with Sovereign Bank for a \$3 million line of credit.
3. Pursuant to the loan agreement, ALY-Wear was able to borrow against certain assets, including its accounts receivable.
4. Pursuant to the loan agreement, ALY-Wear had to submit to Sovereign Bank a daily certificate showing ALY-Wear's current accounts receivable. From on or about September 29, 1999 through on or about October 7, 2000, ALY-Wear submitted approximately

300 of these certificates to Sovereign Bank

5. Sovereign Bank was a financial institution located in Philadelphia, Pennsylvania, whose deposits were insured by the Federal Deposit Insurance Corporation, with FDIC No. 29950.

6. From on or about September 29, 1999, to on or about August 22, 2000 in the Eastern District of Pennsylvania, defendant

ALYSSA TITUS

knowingly made and caused to be made to Sovereign Bank false statements for the purpose of influencing the actions of Sovereign Bank upon a loan, that is a \$3 million line of credit to finance ALY-Wear, in that defendant **ALYSSA TITUS** caused to be submitted to Sovereign Bank certificates in which she purported to report the value of ALY-Wear's accounts receivable, when in truth and fact, as the defendant then well knew, these certificates falsely inflated ALY-Wear's accounts receivables.

In violation of Title 18, United States Code, Sections 1014 and 2.

NOTICE OF ADDITIONAL FACTORS

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. In committing the offense charged in Count One of this information,
defendant **ALYSSA TITUS**:

- a. Committed an offense in which the loss exceeded at least
\$1,000,000, as described in U.S.S.G. § 2B1.1(b)(1).
- b. Committed an involving more than minimal planning, as described
in U.S.S.G. §2B2.1(b)(1).

PATRICK L. MEEHAN
United States Attorney